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VIA ECF

September 1, 2023

Hon. Judge Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Cynthia Lochnicki, et. al. v. Planned Building Services, Inc., et. al.*,
No. 1:23-cv-02822-ENV-SJB

To The Honorable Judge Vitaliano:

This office represents plaintiffs Cynthia Lochnicki and Chequwan Potter in the above captioned action. I write to request a modification to the briefing schedule for Defendants' motion to dismiss. I am requesting a two week extension to the schedule. This is the first request for extension of this briefing schedule. This will not effect any other deadlines. Defendants consent to the request. On July 20, 2023 Your Honor adopted the parties' proposed briefing schedule for Defendants' motion, as follows:

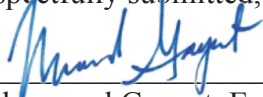
- Defendants to serve their opening papers by August, 11 2023;
- Plaintiff to serve her opposition papers by September, 1 2023;
- Defendants shall serve their reply papers by September 15, 2023.

I submit this letter to respectfully request an extension of time allowing the parties to amend their briefing schedule as follows:

- Plaintiff to serve her opposition papers by September, 15, 2023;
- Defendants shall serve their reply papers by October 2, 2023.

I note that this request is being made less than 48 hours in advance of the deadline to serve opposition papers. The reason for this is that my office had intended to serve this request sooner, but we lost track of the deadline. For the past two weeks, we have been in constant contact with Defendants trying to schedule a mediation as well as exchanging settlement offers. We had contacted at least three mediators and gone through a round of negotiations which led to progress on the settlement front. In the midst of that, I forgot to submit this request earlier in the week. As there is no prejudice to the Defendants given their consent, I respectfully request that the Court grant this brief two week extension to allow additional time for potential settlement, narrowing of the issues in dispute, and my opposition to be filed. I thank the Court for its time and attention to this matter.

Respectfully submitted,



Mohammed Gangat, Esq.